

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., a Florida
not-for-profit corporation, and CENTER FOR
BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit
organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary
of the UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Intervenor/Plaintiff.

**PLAINTIFFS' SUPPLEMENT¹ TO CROSS-EXAM EXHIBIT LIST
FOR AUGUST 12, 2025 HEARING**

On Monday August 4, 2025, Defendants Kristi Noem, in her official capacity as Secretary of the United States Department of Homeland Security and Todd Lyons, in his official capacity as Acting Director of the United States Immigration And Customs Enforcement (the

¹ This list supplements the list identified in Plaintiff's Cross-Exam Exhibit List filed on Friday, August 8, 2025 (D.E. 108) and adds thirteen additional items that Plaintiffs may use in cross-examining Defendants witnesses. Plaintiffs' Preliminary Witness and Exhibit List (D.E. 81), filed on Friday, August 1, included as a catch all impeachment materials. Defendants disclosed their witnesses on Monday, August 4. (D.E. 91 and 90). These "cross-examination" exhibits are listed to provide Defendants notice of exhibits that Plaintiffs may use in cross-examining Defendants' witnesses, and could not have been identified before Defendants identified the witnesses they intended to call.

“Federal Defendants”) and Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management (“FDEM”) disclosed three witnesses they intend to call in this matter. Plaintiffs, through undersigned counsel, hereby supplements their Cross-Exam Exhibit List (DE 108) to identify exhibits that may be used to cross Defendants’ witnesses when the Injunction Hearing resumes on August 12, 2025. Plaintiffs reserve the right to add exhibits depending on the substance of the witnesses’ testimony, and to provide rebuttal evidence:

CROSS-EXAM EXHIBIT LIST (DISCLOSED FRIDAY, AUGUST 8

98	Florida State of Emergency Response Team (SERT) South Florida Detention Facility Continuity of Operations Plan	
99	Resume of Mike Radford, PE (SEC Engineers, Dillon Reio’s colleague)	
100	2015.05.18 Miami-Dade County, Miami International Airport – Miami Dade Aviation Department – Operational Directive No. 15-02, effective June 2, 2025 (Purpose: To establish policy and procedures regarding the use of the Dade-Collier Training & Transition Airport (TNT))	
101	Noem image – “over 10 miles of Everglades on all sides of facility” IMG_1076	
102	“Operations at [the Facility] are ongoing and deportations continuing,” @GovRonDesantis, X (8/7/25 4:53 P.M.)	
103	Photographs of new fencing on access road	
104	August 7, 2025 Statement of Miami-Dade County Mayor Daniella Levine Cava	
105	Link to July 25, 2025 press conference, “Deportation flights from Florida’s ‘Alligator Alcatraz’ detention center have begun, DeSantis says,” https://www.wilx.com/2025/07/25/deportation-flights-floridas-alligator-alcatraz-detention-center-have-begun-desantis-says/	
106	Stephen Miller, White House Deputy Chief of Staff for Policy and Homeland Security Advisor, July 16, 2025 Fox News interview, https://url.us.m.mimecastprotect.com/s/fPTWC68pgltYMk4fpfYi5iUWc?domain=x.com	
107	SERT Order No. PO-010162 (\$1,180,000) IRG Global EM	
108	SERT Order No. PO-010177 (\$325,800) Innovative EM	
109	PO-010174 (\$380,000) AC Disaster	
110	SERT Order No. PO-010181 (\$25,594) Trulight LLC	

111	SERT Order No. PO-010182 (\$15,699.35) CDW Government	
112	SERT Order No. PO-010183 (\$3,358,700) Granny's Alliance	
113	SERT Order No. PO-010201 (\$24,740) WeatherSTEM Inc.	
114	SERT Order No. PO-010199 (\$848,420.22) Public Safety Solutions	
115	SERT Order No. PO-010200 (\$47,730) Williams Communications	
116	SERT Order No. PO-010198 (\$52,010) Lemoine CDE Logistics	
117	SERT Order No. PO-010197 (\$18,178,796.27) Lemoine CDE Logistics	
118	SERT Order No. PO-010195 (\$2,905,740) TNT Transportation	
119	SERT Order No. PO-010196 (\$2,248,540) IRG Global Emergency	
120	SERT Order No. PO-010307 (\$259,012) Will-Burt Integration & Elevation	
121	SERT Order No. PO-010306 (\$499,869.60) Baker's Communications	
122	SERT Order No. PO-010305 (\$245,141.04) Williams Communications	
123	SERT Order No. PO-010304 (\$27,865) Motorola Solutions, Inc.	
124	SERT Order No. PO-010303 (\$2,192) Motorola Solutions, Inc.	
125	SERT Order No. PO-010302 (\$128,132.40) CDW Government LLC	
126	SERT Order No. PO-010326 (\$36,848,875) LTS, Inc.	
127	Photo of black temporary silt fencing - 2025-07-25	
128	FDHSMV Facebook Post, April 9, 2025 https://www.facebook.com/FLHSMV/posts/today-the-florida-highway-patrol-reaches-a-new-milestone-as-executive-director-d/1065884665572211/	
129	Miami Herald , <i>Exclusive: Hundreds at Alligator Alcatraz Have No Criminal Charges</i> , Miami Herald Learns, July 3, 2025, https://www.miamiherald.com/news/local/immigration/article310541810.html	
130	Miami Herald, <i>Is your family member or client at Alligator Alcatraz? We obtained a list</i> , https://www.miamiherald.com/news/local/immigration/article310541770.html#storylink=cpy	
131	Outside Everglades Detention Center by Carrie Feit Portraits	
132	Carrie Feit Photo Declaration	
133	LinkedIn page for Ian-Paul Gadea-Guidicelli, MPA, CEM, FPDM	
134	Homeland Security "Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain – Dormitory Construction at Immigration and Customs Enforcement Krome Service Processing Center – Miami, Florida	
135	Texts from Israel O. Herrera, ICE Assistant Field Officer to FDEM re Standards	

	and Compliance Tour Scheduling.	
136	Ralph Arwood - 08-08-2025 KTNT 06	
137	Ralph Arwood - 08-08-2025 KTNT 15	
138	Ralph Arwood -08-08-2025 KTNT 17	
139	Ralph Arwood - 08-08-2025 KTNT 82	
140	Ralph Arwood - 08-08-2025 KTNT 76	
141	Ralph Arwood - 08-08-2025 KTNT 79	
142	Ralph Arwood - 08-08-2025 KTNT 09	
143	08.08.2025 Brian Mast letter to Jessica Namath	
144	08.08.2025 Declaration of Cooper Kass	
145	Ralph Arwood - 08-08-2025 KTNT (Video)	

SUPPLEMENTAL EXHIBITS

146	2025.08.05 Declaration of Joseph Kinnebrew	
147	FDEP - Florida Panther Consultation Area Florida Department of Environmental Protection Geospatial Open Data	
148	2019 ICE OIG Report	
149	2025 State Immigration Council Agenda	
150	A look at Florida's immigration arrest numbers in 2025 _ WUSF	
151	Baker County IGSA	
152	DOC Addendum ACLU Case	
153	Final Environmental Assessment for the Proposed Contract Detention Facility in the Houston, Texas Area of Operations	
154	Final Notice and Public Explanation of a Proposed Activity - Krome _ Homeland Security	
155	Glades IGSA	
156	Matt Luchins Declaration	
157	Venezuelan influencer Luis Frio faints in Alligator Alcatraz – NBC 6 South Florida	
158	2025.08.11 Declaration of Miranda Daviduk	

Dated: August 11, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 11, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

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